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STATE OF COLORADO

Roy Romer
GovernorPatricia A. Nolan, MD, MP
Executive Director

COLORADO DEPARTMENT OF HEALTH

Dedicated to protecting and improving the health and
environment of the people of Colorado

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August 12, 1993

Mr. Thomas Grumbly
 Assistant Secretary for Environmental
 Restoration and Waste Management
 U.S. Department of Energy
 1000 Independence Avenue SW
 Washington, D.C. 20585

Dear Mr. Grumbly:

Rocky Flats no longer has a weapons production mission, but it does have a new mission that is vital to the health and well-being of the people of Colorado. This mission is environmental restoration, and decontamination, decommissioning, and the safe and secure storage of Rocky Flats wastes and nuclear materials. Simply put, Rocky Flats is now the largest hazardous, radioactive, and mixed waste management facility in this region.

The plant is currently storing thousands of cubic yards of mixed wastes, along with substantial quantities of special nuclear materials. Many of these wastes and materials are stored in marginal or unsafe conditions that should be upgraded as soon as possible. Most will require treatment of one sort or another to stabilize them or prepare them for transport and/or disposal, and some of that treatment will occur in treatment units that do not yet exist. Treatment of the materials will, in some cases, generate increased quantities of wastes. Likewise, cleanup of environmental contamination, decontamination and decommissioning activities will generate substantial quantities of waste.

In light of decisions over the past eighteen months to cease nuclear and non-nuclear weapons production at Rocky Flats, the Denver metropolitan area stands to lose hundreds, or even thousands, of jobs. The threat of losing these jobs has prompted an effort to minimize the economic and personal impacts on the displaced workers and their communities. Part of this effort has focused on "interim re-use" (i.e., leasing for private economic use) of one or more buildings at Rocky Flats that are no longer needed for the plant's former production mission. While we at the Colorado Department of Health fully support the goal of minimizing adverse impacts on Rocky Flats workers and their communities, we are very concerned that the proposals for interim reuse of any buildings at Rocky Flats in the near-term may be premature and could interfere with important waste management and environmental

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restoration activities, as expressed in the attached letter.

The "re-use" proposal currently in consideration, prepared by Manufacturing Sciences Corporation (MSC), contains many desirable features. The plan potentially recycles waste materials into useable products, and employs a large number of plant workers expected to be laid off over the next few years. Unfortunately, the attractive features of this proposal cannot be adequately evaluated without an overall plan for the management of the facility as a whole, with particular attention to the waste storage and treatment needs as well as the physical requirements for safe storage of special nuclear materials. Pursuant to a recent DOE commitment, DOE is evaluating its projected mixed waste storage needs and potential storage capacity. This analysis is not scheduled for completion until October, 1994. We encourage DOE to expedite that analysis to the greatest extent feasible, recognizing it as a necessary foundation for any type of facility "re-use" decision.

The Colorado Department of Health welcomes an opportunity to participate in the development and/or assessment of this facility management plan, along with other interested community groups, such as the Citizens' Advisory Board and the Rocky Flats Local Impacts Initiative. Development of a facility management plan should be characterized as a pre-Phase 1 component to the MSC proposal, allowing the regulators and the entire community to evaluate how this proposal would fit into ongoing plant clean up, waste and material storage, and decontamination and decommissioning activities. The only time-sensitive aspect of the MSC proposal relates to workers being laid off this October. DOE could mitigate worker impacts by retraining the appropriate workers into decontamination and decommissioning positions, in anticipation of accelerating this phase of the plant's mission. ✓

We think that this and other plans must recognize the fundamental change in the plant's mission, and that DOE's first priority for the plant must be to bring it into compliance with applicable requirements (such as the Colorado Hazardous Waste Management Act) as well as other appropriate requirements. As opposed to being mothballed, Rocky Flats must be upgraded to enable DOE to safely carry out its new waste management mission which will likely continue for the next 20 years or more.

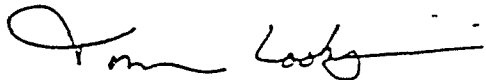
The Rocky Flats plant is not closing, contrary to popular belief. Instead, it will be the site of extensive environmental clean up, sizeable waste management activities and interim storage for substantial quantities of special nuclear materials for many years. One of the most urgent tasks facing DOE is to provide adequate storage capacity at Rocky Flats for existing and projected wastes.

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In this context, interim reuse for existing buildings for non-DOE purposes before waste storage needs have been identified and provided for seems premature.

We share your concerns for the economic impacts associated with the closure of Rocky Flats plant, and would appreciate the opportunity to visit with you about your perspective on this issue. Please feel free to call me at 303/692-3099 if you would like to arrange an opportunity to do so.

Thank you,



Thomas Looby, Director
Office of the Environment

cc: Robert DeGrasse, DOE HQ
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